FILED
UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

NOV 01 2016

MATTHEW J. DYKMAN
CLERK

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	CRIMINAL NO. 16-4220 MV
	)	
vs.	)	Count 1: 18 U.S.C. § 371: Conspiracy;
	)	
JENNIFER M. MIERA,	)	Count 2: 18 U.S.C. § 2113(b): Bank Theft;
TROY MONTOYA, and	)	
SHAWN M. GOODRUM, JR.,	)	Count 3: 18 U.S.C. § 2113(c): Receipt of
	)	Funds Stolen From a Bank.
Defendants.		

INDICTMENT

The Grand Jury charges:

Count 1

From on or about October 5, 2016, and continuing to on or about October 11, 2016, in Taos County, in the District of New Mexico, and elsewhere, the defendants, **JENNIFER M. MIERA** and **TROY MONTOYA**, unlawfully, knowingly and intentionally combined, conspired, confederated, agreed, and acted interdependently with each other and with other persons whose names are known and unknown to the Grand Jury to commit bank theft, contrary to 18 U.S.C. § 2113(b).

Manner and Means

The manner and means by which the defendants, **MIERA** and **MONTOYA**, sought to accomplish the objectives of the conspiracy included, among other things, the following:

a. Meeting to discuss the location and plan for the bank theft;

b. Purchasing gloves and masks for use during the commission of the bank theft;

c. Preparing the bank theft demand note for use in the commission of the bank theft;

d. Preparing the sequence of events for the commission of the bank theft; and

e. Executing the bank theft with **MONTOYA** serving as the getaway driver and **MIERA** remaining at her bank teller desk-window.

Overt Acts

In furtherance of the conspiracy, and to effect the objects thereof, the following overt acts, among others, were committed in the District of New Mexico, and elsewhere:

a. On or about October 5, 2016, **MIERA** and **MONTOYA** travelled to a Walmart store located in Taos County, New Mexico;

b. On or about October 5, 2016, **MIERA** and **MONTOYA** purchased disguise material, gloves and masks;

c. On or about October 5, 2016, **MIERA,** Personal Banker at People's Bank, and her cousin, **MONTOYA,** discussed and planned the details and sequence of events to accomplish the bank theft of the People's Bank located at 121 East Main Street, Red River, New Mexico, 87558;

d. On or about October 5, 2016, **MIERA** and **MONTOYA** drove to the People's Bank located at 121 East Main Street, Red River, New Mexico, 87558; and

e. On or about October 5, 2016, **MIERA** connected with **MONTOYA** at her bank teller desk-window, gave her the demand note that they previously had agreed to and **MIERA** then filled a bag with approximately $12,229.00 that she removed from her bank drawer.

In violation of 18 U.S.C. § 371.

Count 2

On or about October 6, 2010, in Taos County, in the District of New Mexico, the defendants, **JENNIFER M. MIERA** and **TROY MONTOYA**, did knowingly take and carry away with intent to steal and purloin a sum of United States currency, approximately $12,229.00, of a value exceeding $1,000.00, belonging to and in the care, custody, control, management and possession of the People's Bank, located at 121 East Main Street, Red River, New Mexico, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

In violation of 18 U.S.C. § 2113(b).

Count 3

From on or about October 5, 2016, and continuing to on or about October 11, 2016, in Taos County, in the District of New Mexico, the defendant, **SHAWN M. GOODRUM, JR.**, having knowledge of the actual commission of a felony cognizable by a court of the United States, to wit, bank theft, referenced above in Counts 1 and 2, did knowingly and unlawfully receive, possess, conceal and dispose of approximately $6,000.00 of the funds associated with the bank theft referenced above in Counts 1 and 2 and with that approximate $6,000.00 made expenditures and began travel in the satisfaction of personal interests.

In violation of 18 U.S.C. § 2113(c).

A TRUE BILL:

/s/
FOREPERSON OF THE GRAND JURY

Assistant United States Attorney

KAB 10/31/16 2:14PM